

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LAURA BOGDAN and MARISSA FORESTA, on behalf of themselves and all others similarly situated, )  
Plaintiffs, )  
v. )  
ABBOTT LABORATORIES )  
EMPLOYEES CREDIT UNION, )  
Defendant. )  
LLOYD GARCIA and KARLA GARCIA, on behalf of themselves and all others similarly situated, )  
Plaintiffs, )  
v. )  
ABBOTT LABORATORIES )  
EMPLOYEES CREDIT UNION, )  
Defendant. )  
SONIA J. PEREZ, individually and on behalf of all others similarly situated, )  
Plaintiff, )  
v. )  
ABBOTT LABORATORIES )  
EMPLOYEES CREDIT UNION, )  
Defendant. )  
KELLY MONASTIRIAKOS, individually and on behalf of all other similarly situated, )  
Plaintiff, )  
v. )

Case No. 1:24-cv-10930  
Judge Franklin U. Valderrama

Case No. 1:24-cv-10973  
Judge Thomas M. Durkin

Case No. 1:24-cv-11569  
Judge Franklin U. Valderrama

Case No. 1:24-cv-11823  
Judge John F. Kness

ABBOTT	LABORATORIES	)	
EMPLOYEES CREDIT UNION,		)	
		)	
<u>Defendant.</u>		)	
LAKEENA THOMPSON, individually and on	)		
behalf of all other similarly situated,	)		
	)		
<u>Plaintiff,</u>		)	Case No. 1:24-cv-12283
	)		Judge Matthew F. Kennelly
v.	)		
	)		
ABBOTT	LABORATORIES	)	
EMPLOYEES CREDIT UNION,		)	
	)		
<u>Defendant.</u>		)	
SHARITA MEDINA and JOHN	)		
WILLIAMS, individually and on behalf of all	)		
others similarly situated,	)		
	)		
<u>Plaintiffs,</u>		)	Case No. 1:24-cv-13081
	)		Judge Andrea R. Wood
v.	)		
	)		
ABBOTT	LABORATORIES	)	
EMPLOYEES CREDIT UNION,		)	
	)		
<u>Defendant.</u>		)	

**DEFENDANT ABBOTT LABORATORIES EMPLOYEES CREDIT UNION'S  
UNOPPOSED MOTION TO STAY ALL RESPONSE AND SCHEDULING DEADLINES  
PENDING REASSIGNMENT AND CONSOLIDATION OF ALL CASES**

Defendant Abbott Laboratories Employees Credit Union (“ALEC”) states as follows:

1. Plaintiffs Laura Bogdan and Marissa Foresta filed their Complaint against ALEC on October 23, 2024. Their case is pending before Judge Valderrama.
2. Five other related lawsuits against ALEC have since been filed in this Court or removed to this Court from the Circuit Court of Lake County: *Garcia and Garcia v. Abbott Laboratories Employees Credit Union*, Case No. 1:24-cv-10973 (Judge Durkin); *Perez v. Abbott Laboratories Employees Credit Union*, Case No. 1:24-cv-11569 (Judge Valderrama);

*Monastiriakos v. Abbott Laboratories Employees Credit Union*, Case No. 1:24-cv-11823 (Judge Kness); *Thompson v. Abbott Laboratories Employees Credit Union*, Case No. 1:24-cv-12283 (Judge Kennelly); and *Medina and Williams v. Abbott Laboratories Employees Credit Union*, Case No. 1:24-cv-13081 (Judge Wood).

3. On January 7, 2024, counsel for ALEC conferred with counsel for Plaintiffs in the six pending cases and is informed that Plaintiffs intend to file motions to reassign and to consolidate all six pending class actions into Judge Valderrama's courtroom (presiding over the first-filed *Bogdan and Foresta* class action).

4. Plaintiffs' consolidation motion will seek to stay deadlines in all individual cases while their consolidation motion gets resolved, to permit a consolidated complaint to be filed if consolidation is allowed, and to permit 45 days thereafter for ALEC to respond to the consolidated complaint.

5. ALEC will not oppose consolidation or the proposed stay of all six class actions during the pendency of Plaintiffs' motions to reassign and to consolidate. However, ALEC does not concede that any class can or should be certified and will oppose class certification.

6. This request is also made with full reservation of the rights and remedies of all parties, including all applicable defenses and objections of ALEC and any remand rights of Plaintiffs whose cases have been removed from Lake County. These rights and remedies include but are not limited to the potential arbitrability defenses of ALEC and any rights to move to remand of any one or more cases to Lake County.

7. ALEC's responses to all six complaints currently are due on January 13, 2025.

8. ALEC asks that the Courts in each of the six respective cases stay all response and other scheduling deadlines pending resolution of Plaintiffs' motions to reassign and to consolidate.

9. Plaintiffs' counsel does not oppose the relief pursued in ALEC's motion.

WHEREFORE, for the foregoing reasons, Defendant Abbott Laboratories Employees Credit Union respectfully requests each Court to stay ALEC's response and all other deadlines and Court dates in each of the *Bogdan and Foresta, Garcia and Garcia, Perez, Monastiriakos, Thompson, and Medina and Williams* cases pending resolution of Plaintiffs' motions to reassign and to consolidate all class actions before Judge Valderrama.

Respectfully submitted,

POLSINELLI PC

/s/ Dmitry Shifrin

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**ATTORNEYS FOR DEFENDANT  
ABBOTT LABORATORIES EMPLOYEES  
CREDIT UNION**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on January 13, 2025. Notice of this filing will be sent to all counsel of record in the *Bogdan and Foresta, Garcia and Garcia, Perez, Monastiriakos, Thompson, and Medina and Williams* cases by electronic mail. Parties may access this filing through the Court's electronic filing system.

*/s/ Dmitry Shifrin*

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Attorney for Defendant  
Abbott Laboratories Employees Credit Union